

77512

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION**

<b>BARBARA KELLUM,</b>	)	
<b>CHRISTOPHER BRADLEY,</b>	)	
<b>I.B. (a minor) by and through her Legal</b>	)	
<b>Guardian Cynthia Simpson,</b>	)	
<b>J.B. (a minor) by and through her</b>	)	
<b>mother and Next Friend Tianna</b>	)	
<b>Wedderburn, and</b>	)	
<b>S.B. (a minor) by and through her</b>	)	
<b>mother and Next Friend Brittney</b>	)	<b>Case No. 1:20-CV-00023</b>
<b>Britt,</b>	)	
<b>as Beneficiaries of Decedent Michael</b>	)	
<b>Byrd,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>CONSENT TO REMOVAL</b>
<b>vs.</b>	)	
	)	
<b>NATIONWIDE INSURANCE</b>	)	
<b>COMPANY OF AMERICA, and</b>	)	
<b>GILSTER-MARY LEE</b>	)	
<b>CORPORATION GROUP HEALTH</b>	)	
<b>BENEFIT PLAN</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

---

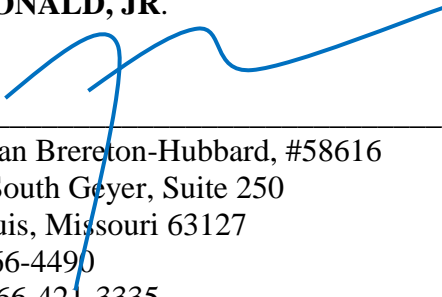
**DEFENDANT NATIONWIDE INSURANCE COMPANY OF AMERICA’S  
CONSENT TO REMOVAL**

---

COMES NOW Defendant Nationwide Insurance Company of America, by and through undersigned counsel, and pursuant to 28 U.S.C. §1446(b) hereby provides notice to this Court that this Defendant consents to the removal of this action, the removal being initiated by Defendant Gilster-Mary Lee Corporation Group Health Benefit Plan.

77512

**LAW OFFICE OF MICHAEL P.  
MCDONALD, JR.**



---

Jonathan Brereton-Hubbard, #58616  
3636 South Geyer, Suite 250  
St. Louis, Missouri 63127  
314-966-4490  
Fax: 866-421-3335  
[breretj@nationwide.com](mailto:breretj@nationwide.com)

Attorneys for Defendant Nationwide  
Insurance Company of America

Certificate of Service

The undersigned certifies that a copy of the foregoing was served on February 4<sup>th</sup>, 2020 via the Court's CM/ECF system to all counsel of record in this action, and also via regular U.S. mail, postage prepaid, to:

Barbara Kellum  
1825 Evondale St.  
Cape Girardeau, MO 63701

Christopher Bradley  
127-03 Jamaica Ave. Apt. 2H  
Richmond Hill, NY 11418

J.B. (a minor),  
c/o Tianna Wedderburn  
1560 Canary Island Dr.  
Weston, FL 33327

S.B. (a minor)  
c/o Brittney Britt  
409 Prospect  
Lancaster, PA 17603

I.B. (a minor)  
c/o Cynthia Simpson  
213 Orange Avenue  
Irvington, NJ 07111